

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**FRED HANEY, MARSHA MERRILL, )  
SYLVIA RAUSCH, STEPHEN SWENSON,)  
and ALAN WOOTEN, Individually and on )  
Behalf of All Others Similarly Situated, )  
  )  
  )  
Plaintiffs,                                 )  
  )      **Civil Action No. 3:22-cv-00055-REP**  
vs.    )  
  )  
**GENWORTH LIFE INSURANCE )  
COMPANY and GENWORTH LIFE )  
INSURANCE COMPANY OF NEW )  
YORK,                                        )  
  )  
Defendants.                                 )**  
  )**

**[PROPOSED] ORDER GRANTING JOINT MOTION TO APPROVE THE  
SETTLEMENT AGREEMENT WITH THE LANG OBJECTORS**

This matter is before the Court on the Joint Motion to Approve the Settlement Agreement with the Lang Objectors (the “Lang Objectors’ Settlement Motion”) filed by Plaintiffs, Defendants, and Objectors Lonny and Carroll Lang (the “Objectors”) in the above-captioned action. On February 7, 2023, the Court heard argument on the Lang Objectors’ Settlement Motion. Having considered the motion, the Joint Stipulation of Settlement with the Lang Objectors (the “Lang Objectors’ Settlement Agreement”), the record, and the brief and oral argument on this matter, it is hereby ORDERED as follows:

1. This Court finds that the settlement of the Langs’ objections has conferred a benefit on the Class and therefore grants the Lang Objectors’ Settlement Motion pursuant to Federal Rule of Civil Procedure 23(e)(5)(B).

2. Pursuant to the Lang Objectors' Settlement Agreement, all objections made by the Lang Objectors, including ECF No. 51 and any objections made orally at a Final Approval Hearing or otherwise, are deemed withdrawn and therefore are denied as moot.

It is so ORDERED.

Dated: \_\_\_\_\_, 2023

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Robert E. Payne  
Senior United States District Judge

Richmond, Virginia  
Date: \_\_\_\_\_, 2023